



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 28 2008

REPLY TO THE ATTENTION OF:

(AE-17J)

Sultana Haque, P.E.
Project Engineer
Cornerstone Environmental Group, LLC
39395 West Twelve Mile Road, Suite 103
Farmington Hills, Michigan 48331

Re: Request for Alternative Timeline for Winnebago Reclamation Service

Dear Mr. Haque:

Thank you for your June 18, 2008 letter to the U.S. Environmental Protection Agency, requesting an alternative compliance timeline to correct exceedances at Winnebago Reclamation Service's Landfill, located in Rockford, Illinois ("Winnebago"). Winnebago is subject to the New Source Performance Standards ("NSPS") for Municipal Solid Waste Landfills ("40 CFR Part 60, Subpart WWW"). The NSPS sets forth compliance provisions for gas collection and control systems under 40 CFR § 60.755.

Your letter requested an alternative timeline to correct the positive pressure exhibited at Well GW191 on June 2, 2008. The regulation at 40 CFR § 60.755(a)(3) states that "If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days...If negative pressure cannot be achieved without excess air filtration within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure. . . . An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval."

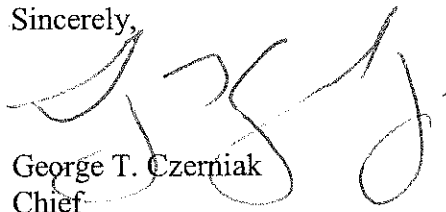
On June 2, 2008, Well GW191 showed a positive pressure reading. Wellhead adjustments were made to correct the positive pressure and re-monitoring was performed within 5 days. The re-monitoring also showed a positive pressure exceedance. Initial investigation indicated that there might be subsurface damage or plugging of the lateral causing restriction of vacuum applied to the well. Winnebago requested until September 30, 2008 or 120 days of alternate compliance timeline for well GW191 from the date of the initial exceedance to continue the investigation and bring the well into compliance.

On July 17, 2008, in response to a telephone inquiry by Ms. Linda H. Rosen, of my staff, you provided an electronic mail update on the status of well GW191. Specifically, Mr. Evan Buskohl of Winnebago landfill explained that on July 8, the well's nearby leachate storage tank was found to be completely full after having been pumped empty only a few

weeks earlier. Typically, this tank receives a trickle flow and only requires pumping a few times a year. Coincidentally, at this time well GW191 was found to have vacuum, and was back in compliance. Mr. Buskohl believes the debris broke free on its own and the back-up of condensate promptly filled the leachate storage tank. You have performed daily inspections of well GW191 since this finding, and the well has been in consistent compliance. Therefore, U.S. EPA is approving an alternative timeline for Winnebago's well GW191 to correct the positive pressure exceedance until July 17, 2008. There is no need to approve a longer time frame.

You plan to proceed with the routine monthly monitoring of this well and will contact us if you require additional information regarding this matter, or if you have any areas of non-compliance at well GW191 next month. If you have any questions regarding this letter, feel free to contact Linda H. Rosen, of my staff, at (312) 886-6810.

Sincerely,



George T. Czerniak
Chief

Air Enforcement and Compliance Assurance Branch

cc: Ray Pilapil, Manager
Bureau of Air – Compliance and Enforcement Section
Illinois Environmental Protection Agency

Khaled Mahmood, P.E.
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